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Exhibit to Memorandum in Support

Part 4

§1962 of RICO and 18 U.S.C. §2." (See Plaintiffs' Complaint at ¶323). Therefore, because there are no allegations to support any wrongdoing or liability by Movants under RICO, Plaintiffs' Count XVI should be dismissed.

# XVII. Money Laundering.

Section 1956 of the Racketeering Act prohibits the knowing and voluntarily engaging in financial transactions to disguise or conceal the source of money unlawfully obtained. 18 U.S.C. §1956. Plaintiffs' Count XVII under this section fails to meet its burden of pleading under Rule 9(b) because it fails to provide any factual allegations related to Ms. Martin, Ms. Guidi, or Mr. Rodriguez to support its claim. Plaintiffs' Complaint does not provide any particular allegations that Ms. Martin, Ms. Guidi, or Mr. Rodriguez were involved in the transfer of funds of unlawfully obtained money. (*See* Plaintiffs' Complaint at Count XVII). Instead, Plaintiffs once again rely on a series of conclusory allegations that the "Sanchez and the other Defendants" took certain actions to conceal the theft of money. Rule 9(b) is clear that such general conclusary allegations will not suffice to save a fraud based claim from dismissal.

Nor do Plaintiffs make any allegations which would create a reasonable inference that Ms. Martin, Ms. Guidi, and Mr. Rodriguez had knowledge that the funds were unlawfully obtained, as alleged, or had the requisite intent to conceal the source of these monies. Therefore, Plaintiffs' Count XVII for money laundering should be dismissed for failure to state a claim.

### **CONCLUSION**

Put simply, Plaintiffs' Complaint does not plead the essential elements against Ms.

<sup>&</sup>lt;sup>1</sup> Moreover, Plaintiffs' Complaint does not provide sufficient factual allegations from which one could reasonably infer that the investments solicited and allegedly not paid back constitutes the stealing of money under 18 U.S.C. §1956.

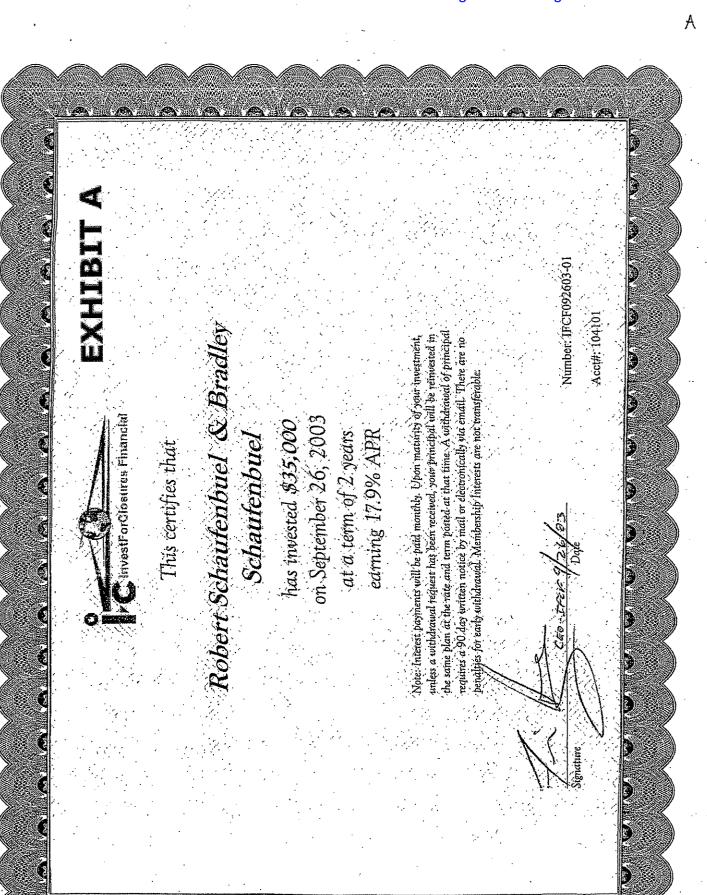
Martin, Ms. Guidi, or Mr. Rodriguez for its causes of action and is in woeful violation of the heightened pleading requirements of Rule 9(b). Plaintiffs' Complaint is completely devoid of any factual allegations of wrongdoing by Ms. Martin, Ms. Guidi, or Mr. Rodriguez. Plaintiffs do not have any knowledge or reasonable belief of any specific wrongdoing by Ms. Martin, Ms. Guidi, or Mr. Rodriguez and have wrongfully named them in this lawsuit in order to conduct an unwarranted fishing expedition against them and the other Defendants. The Seventh Circuit has made clear that such course is improper. Vicom, Inc. v. Harbridge Merchant Services, Inc., 20 F.3d 771, 776. Moreover, Plaintiffs' failure to comply with the Federal Rules is not without its victim. Plaintiffs' unwarranted and improper Complaint is causing sever and unjust harm to the reputations and financial security of Ms. Martin, Ms. Guidi, and Mr. Rodriguez. Indeed, justice demands that this Court dismiss Plaintiff's improper action against Movants to prevent further harassment and harm to Ms. Martin, Ms. Guidi, and Mr. Rodriguez.

WHEREFORE, Defendants, DARCEY L. MARTIN, DEANA M. GUIDI, and TOM RODRIGUEZ, pray that this Court enter an Order dismissing Plaintiffs' Second Amended Complaint in its entirety, or alternatively Counts I-XVII individually against them, pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim.

CAMPION, CURRAN, DUNLOP & LAMB, P.C.

/s/Russell W. Baker

CAMPION, CURRAN, DUNLOP & LAMB, P.C. Attorneys for Defendant, Deana M. Guidi 8600 U.S. Highway 14, Suite 201 Crystal Lake, IL 60012 (815) 459-8440



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Page 1

John & Sarah Reed IV 2304 S. 79th Ave. Yakima, WA 98403

Account #: 204017 Account type: Cash Term Length: 5 years

(NOTE: interest is compounding)

\$160,000 The CEO Bonus (200% bonus on your originally invested principal) that will be paid out to you at the close of your account, or your move to the SOP. Note that this amount will not accrue interest nor change. This is a reward for your patience.

Compound Period:

Annual

Nominal Annual Rate:

20.000%

### AMORTIZATION SCHEDULE - Normal Amortization

	Date	Invest	Return	Interest	Net Change	Balance
Invest	4/6/2005	40,000.00			40,000.00	40,000.00
Invest	9/12/2005	40,000.00		3,484.93	43,484.93	83,484.93
1	3/29/2007		31,050.97	27,566.04	3,484.93-	80,000.00
2	3/31/2008		0.00	16,105.21	16,105.21	96,105.21
Grand Tota	ls	80,000.00	31,050.97	47,156.18	96,105.21	

An open balance of 96,105.21 still remains.

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Page 1

John & Sarah Reed IV 2304 S. 79th Ave. Yakima, WA 98403

Account #: 204017--SOP

Account type: Cash Term Length: 2 years

(NOTE: interest is compounding)

41,051 Warrants for Fresh dollars and interest Rollover

6,210 20% bonus Warrants on interest rolled over for being in IFC since 2003

47,261 Total Warrants as of 03.29.07

Compound Period:

Annual

Nominal Annual Rate:

18.000%

### AMORTIZATION SCHEDULE - Normal Amortization

Date	Invest	Return	Interest	Net Change	Balance
Invest 3/30/2007	10,000.00			10,000.00	10,000.00
Invest 3/30/2007	31,050.97		0.00	31,050.97	41,050.97
1 3/31/2008		0.00	7,413.06	7,413.06	48,464.03
Grand Totals	41,050.97	0.00	7,413.06	48,464.03	

An open balance of 48,464.03 still remains.

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Case 1:09-cv-01221

This certifies that

John Pehraan 12, 2005

On Pehraan 12, 2005

at a term of 5 years

earning 20% APR

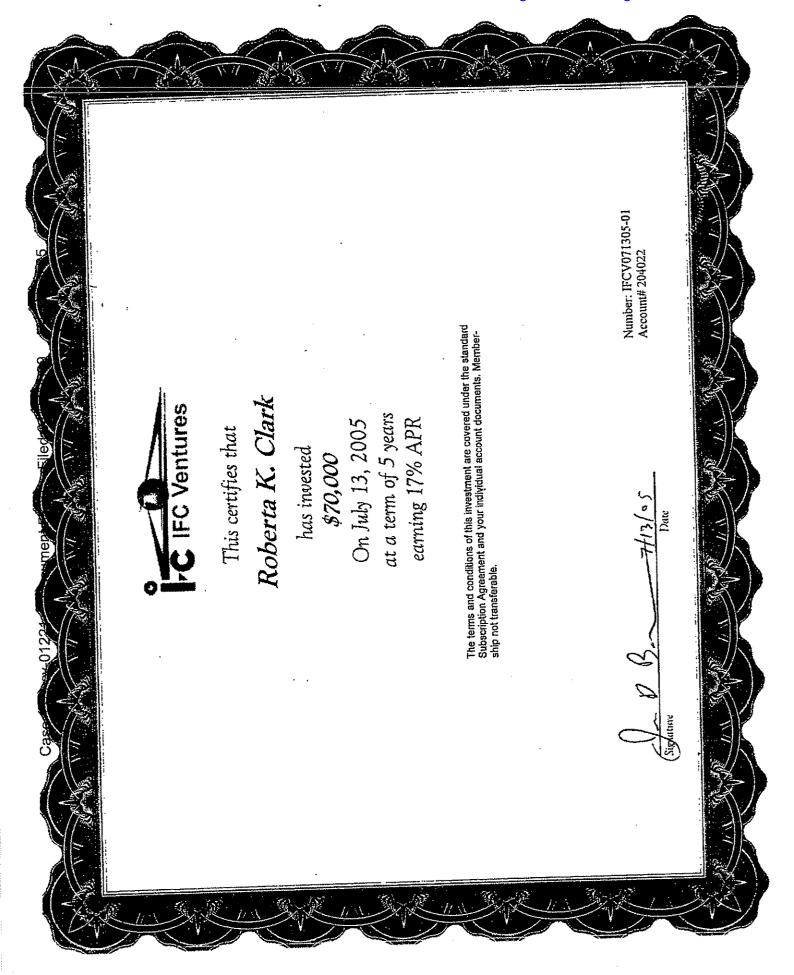
UNDATED TO 200% CEO BONUS

The terms and conditions of this invasionent are coverest under the skindard. Subscription Agreements and your individual accurate documents. Wenther-ship instituents transferable.

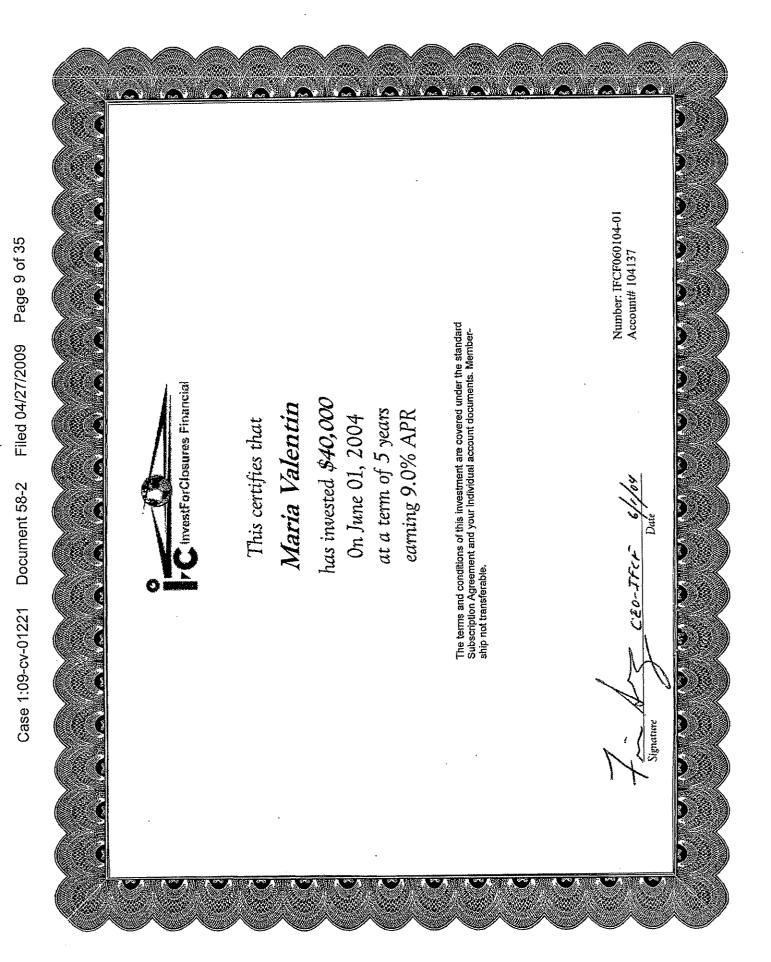
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Case 1:09-cv-(

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Page 1

Maria Valentin 32W121 Bode Road Elgin, IL 60120

Account # 104137-SOP Account Type: Cash Term Length: 2 years

### Warrants:

90,061 Warrants 1:1 for fresh dollars and rolled over monies from other accounts 24,018 30% Bonus Warrants on rolled over monies from other accounts for being with IFC since 2001 114,079 Total Warrants as of 10.30.06

Compound Period:

Annual

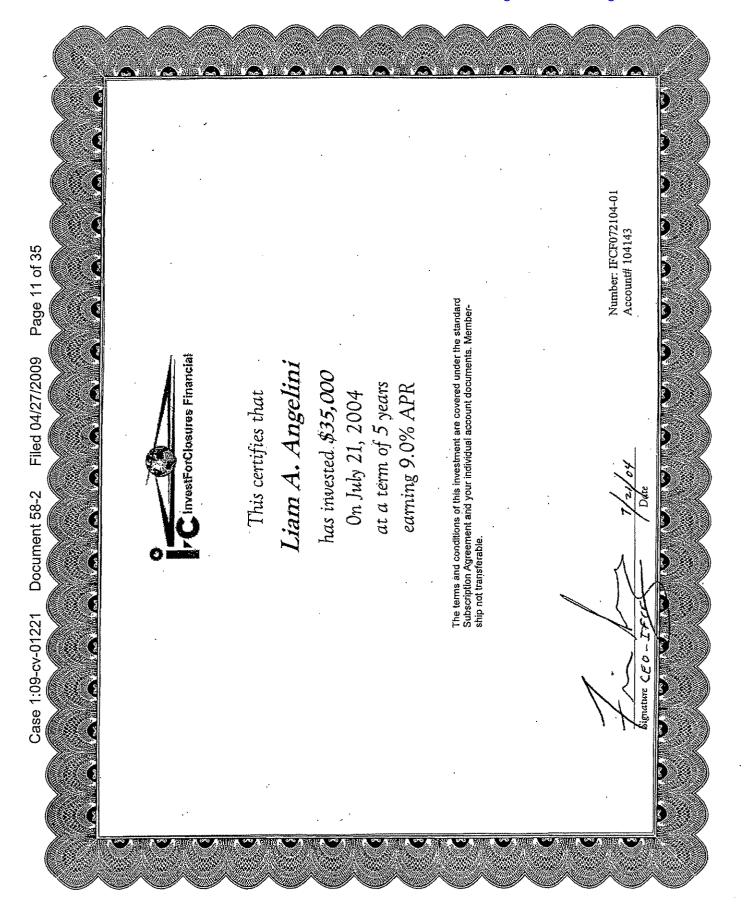
Nominal Annual Rate:

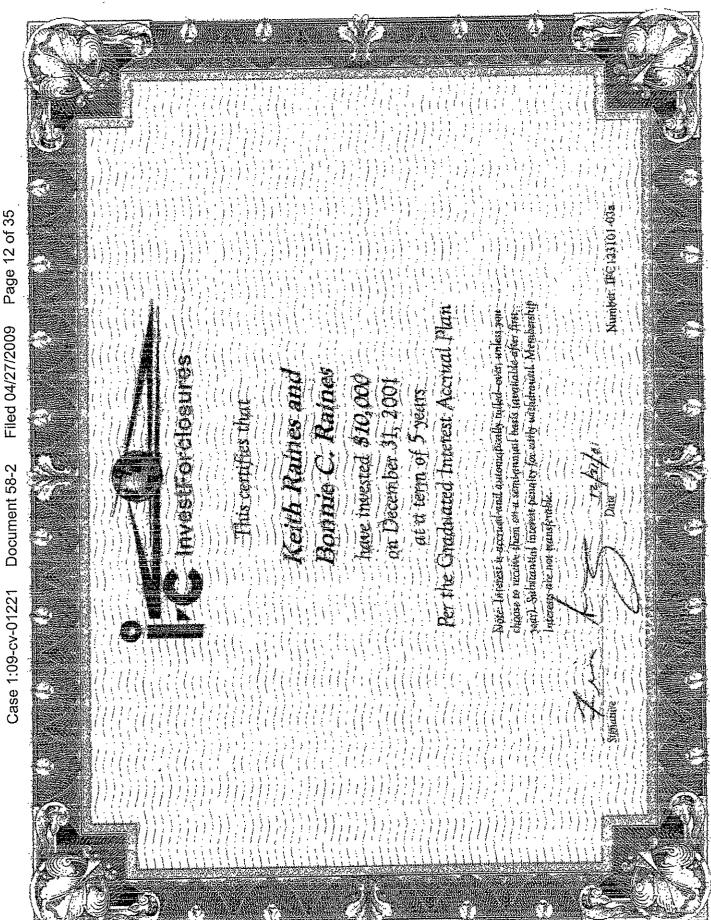
18.000%

# AMORTIZATION SCHEDULE - Normal Amortization, 360 Day Year

	Date	invest	<b>Balance Date</b>	Return	Interest	Net Change	Balance
Invest	10/30/2006	10.000.00				10,000.00	10,000.00
	10/30/2006				0.00	9,318.03	19,318.03
	10/30/2006				0.00	70,742.57	90,060.60
lance Date		, m,	0.00		24.287.54	24,287.54	114,348.14
Grand Tota		90,060.60	0.00		•	114,348.14	,

An open balance of 114,348.14 still remains.





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Case 1:09-cv-01221

Graduated Interest Actival Plan
Account Grawth ber Year (compound interest plus principle);

12/31/02 @ 20% = \$12,000

12/31/03 @ 22% = \$14,640

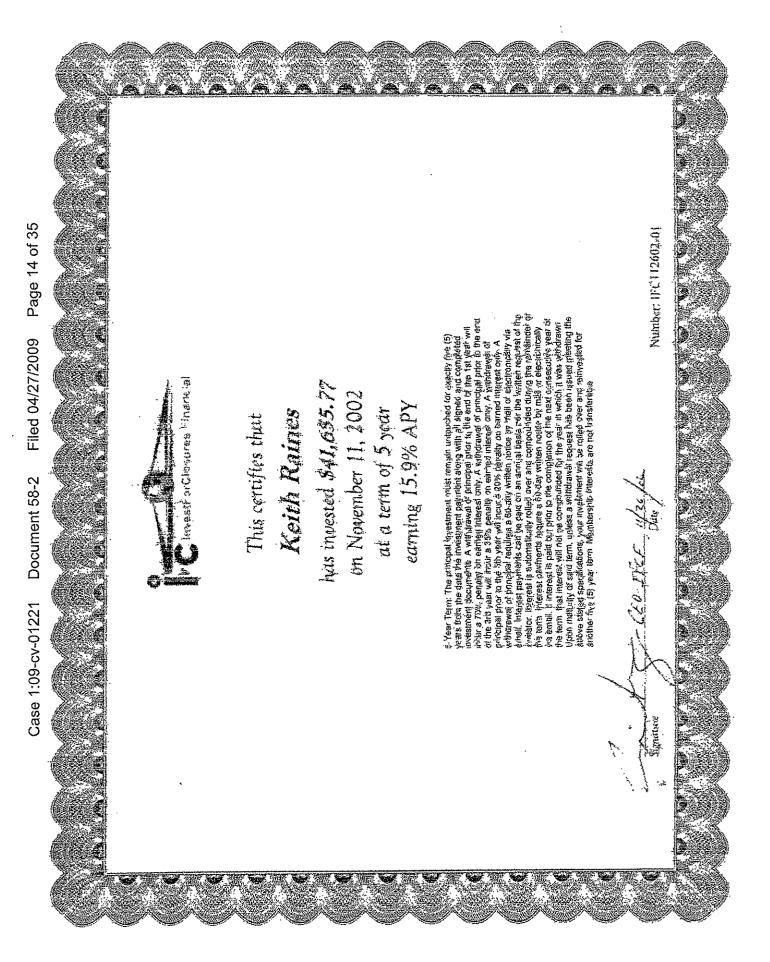
12/31/04 @ 24% = \$18;154

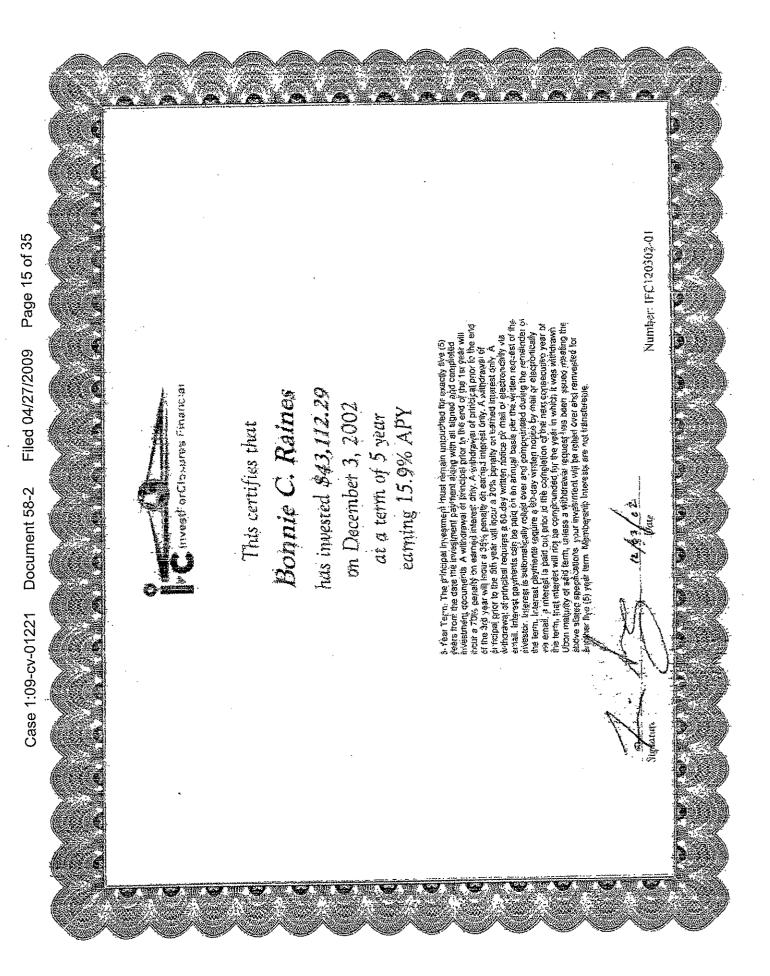
12/31/05 @ 26% = \$22,874

12/31/06 @ 28% = \$29,278

This replaces certificate number IPC123101-03, which was reported lost and is now yold.

ij





Page 1

Ravikumar & Sumathi Jammalamadaka 5 Amy Drive North Brunswick, NJ 08902

Account #: 104106 Account Type: Cash Term Length: 5 years

Compound Period:

Annual

Nominal Annual Rate:

8.900%

# AMORTIZATION SCHEDULE - Normal Amortization, 360 Day Year

	Date	Invest	Balance Date	Return	Interest	Net Change	Balance
Invest	11/18/2003	25,000.00				25,000.00	25,000.00
2003 Totals		25,000.00	0.00	0.00	0.00	25,000.00	
1	4/21/2006			5,000.00	5,784.12	784.12	25,784.12
2	6/26/2006			20,000.00	420.71	19,579.29-	6,204.83
3	6/26/2006			2,171.69	0.00	2,171.69-	4,033.14
4	6/27/2006			2,700.00	1.00	2,699.00-	1,334.14
2006 Totals		0.00	0.00	29,871.69	6,205.83	23,665.86-	
Balance Date	3/31/2008		0.00		218.23	218.23	1,552.37
Balance Date	6/30/2008		0.00		34.92	34.92	1,587.29
Balance Date	9/30/2008		0.00		36.10	36.10	1,623.39
Balance Date	12/31/2008		0.00		36.92	36.92	1,660.31
2008 Totals		0.00	0.00	0.00	326.17	326.17	
Grand Totals		25,000.00	0.00	29,871.69	6,532.00	1,660.31	

An open balance of 1,660.31 still remains.

Page 1

Ravikumar Jammalamadaka 5 Amy Drive North Brunswick, NJ 08902

Account #: 204001 Account Type: Cash Term Length: 5 years

\$200,000 The CEO Bonus (200% bonus on your originally invested principal) that will be paid out to you at the close of your account, or your move to the SOP. Note that this amount will not accrue interest nor change. This is a reward for your patience.

Rate Period:

Quarterly

Nominal Annual Rate:

25.000%

# AMORTIZATION SCHEDULE - U.S. Rule (no compounding), 360 Day Year

		Interest	Interest	Principal		Balance Due -	
Date	Payment	Accrued	Paid	Paid	Interest	Principal	Total
Loan 12/28/2004	1	0.00	0.00	0.00	0.00	100,000.00	100,000.00
2004 Totals	0.00	0.00	0.00	0.00			
4 /5 /500	4= 000 00		45.000.00			400 000 00	
1 1/5/2006	15,000.00	25,555.56	15,000.00	0.00	10,555.56	100,000.00	110,555.56
2 4/3/2006	17,228.49	6,111.11	16,666.67	561.82	0.00	99,438.18	99,438.18
3 6/21/2006	20,000.00	5,455.29	5,455.29	14,544.71	0.00	84,893.47	84,893.47
2006 Totals	52,228.49	37,121.96	37,121.96	15,106.53			
4 1/2/2008	4,500.00	32,483.54	4,500.00	0.00	27,983.54	84,893.47	112,877.01
5 3/31/2008	0.00	5,246.89	0.00	0.00	33,230.43	84,893.47	118,123.90
6 6/30/2008	0.00	5,305.84	0.00	0.00	38,536.27	84,893.47	123,429.74
7 9/30/2008	0.00	5,305.84	0.00	0.00	43,842.11	84,893.47	128,735.58
8 12/31/2008	0.00	5,305.84	0.00	0.00	49,147.95	84,893.47	134,041.42
2008 Totals	4,500.00	53,647.95	4,500.00	0.00			

**Grand Totals** 

56,728.49 90,769.91 41,621.96 15,106.53

An open balance of 134,041.42 still remains.

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PAGE 03/05

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Page 1

Paul Herink 291 Frank Applegate Road Jackson, NJ 08527-4215

Account# 104111 Account Type: IRA Term Length: 5 years

Compound Period:

Annual

Nominal Annual Rate:

10.900%

# AMORTIZATION SCHEDULE - Normal Amortization, 360 Day Year

	Date	Invest	Balance Date	Return	Interest	Net Change	Balance
Invest	12/22/2003	30,476.60				30,476.60	30,476.60
Balance Date			0.00		17,018.31	17,018.31	47,494.91
Balance Date			0.00		1,308.62	1,308.62	48,803.53
Balance Date			0.00		1,359.45	1,359.45	50,162.98
Balance Date		•	0.00		1,397.32	1,397.32	51,560.30
Balance Date			0.00		1,405.02		52,965.32
	\$\\$\I\ZUU3	70 476 60	0.00	0.00		52,965.32	
Grand Totals		30,476.60	UIUU	0.00	22,700112	JE,5011E	

An open balance of 52,965.32 still remains.

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Yahoo! Mail bigguy8230@yahoo.com

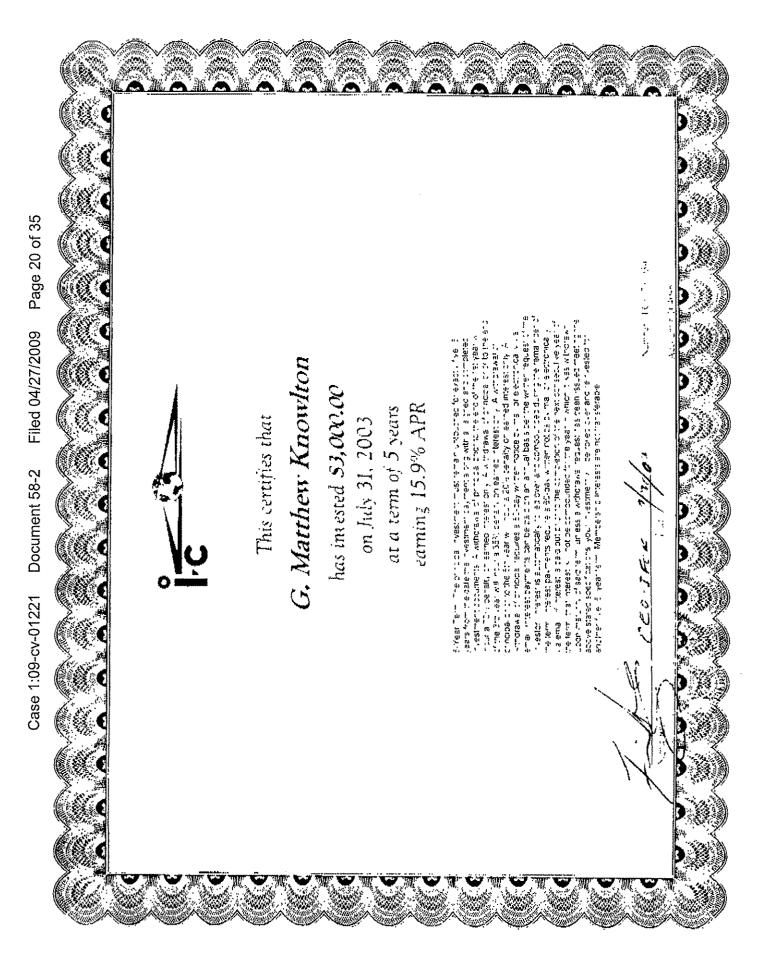
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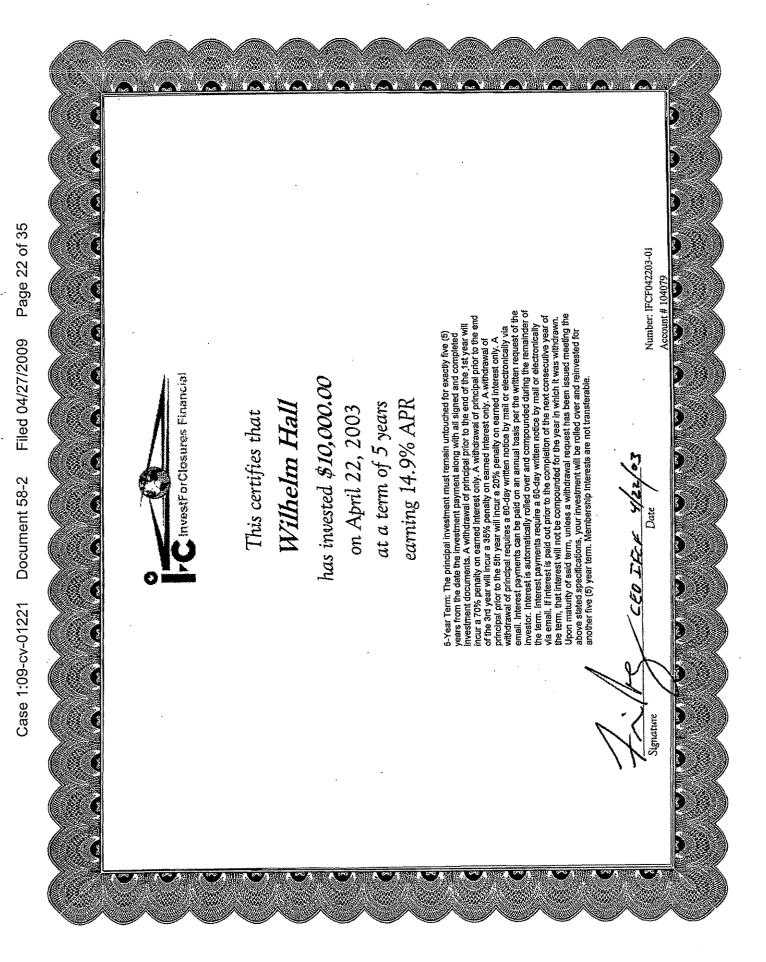
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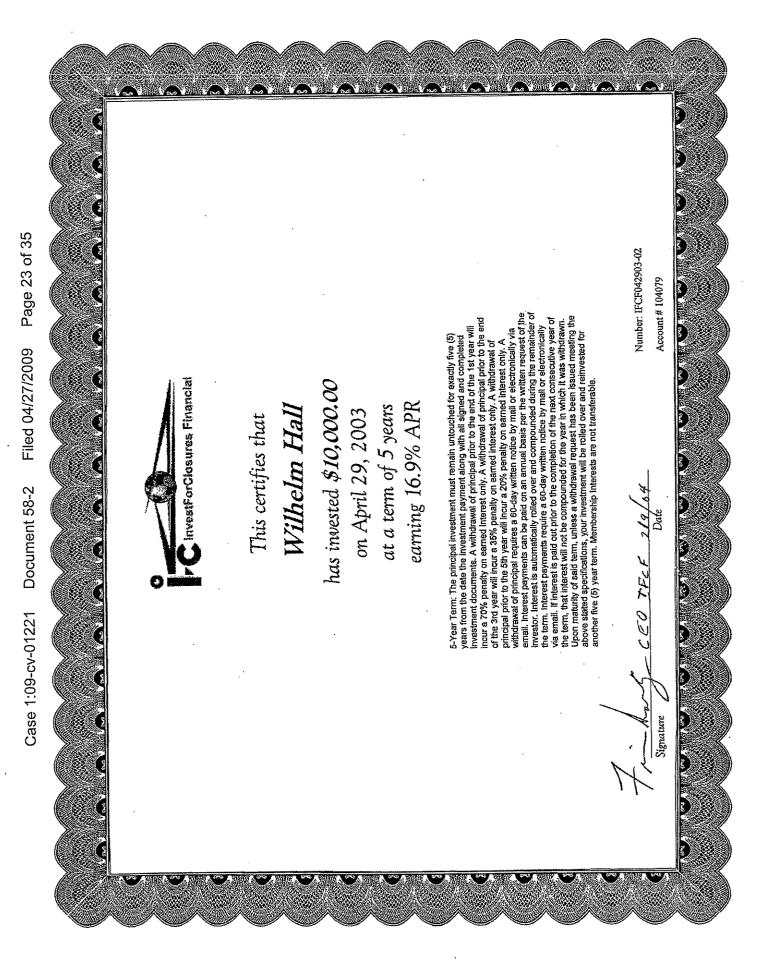
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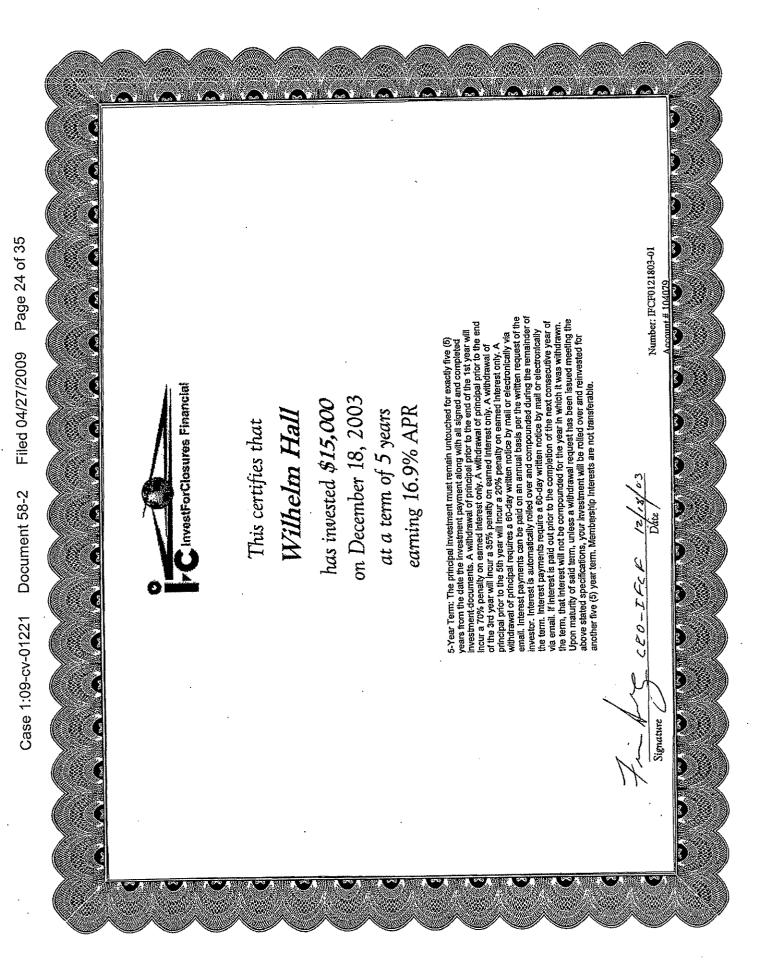
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Compound Period		1.5	Amunu				
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An open balance of 10 145 82 still remains					<u> </u>		
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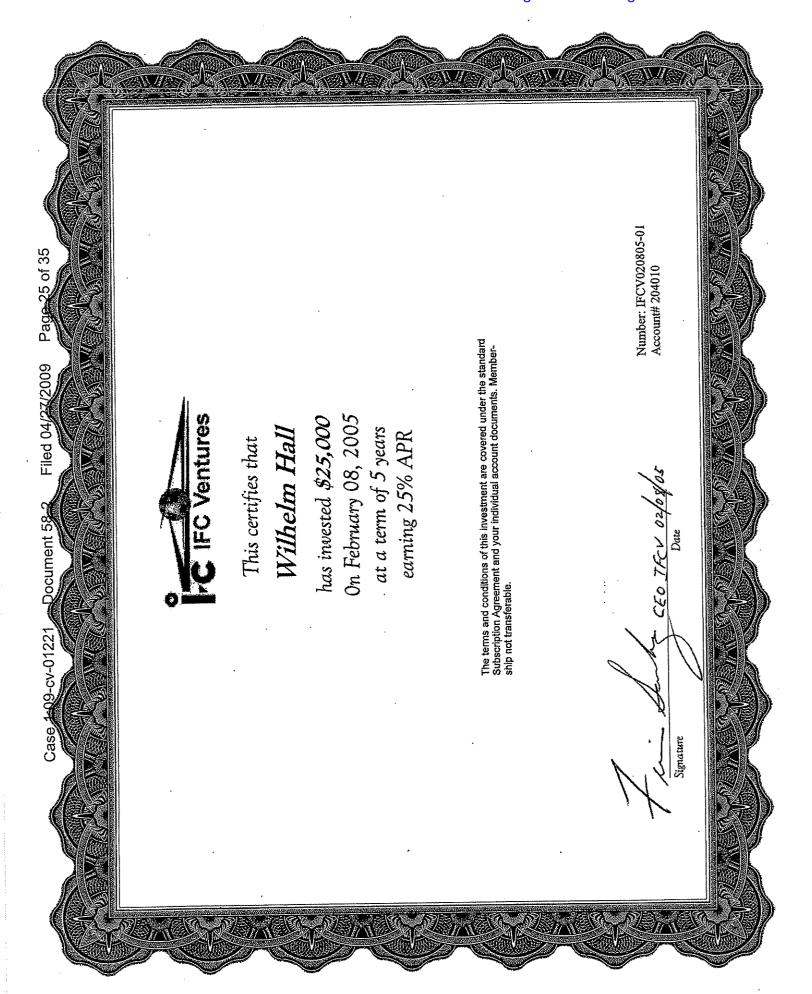












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Wilhelm Hall 237 Rock Ave. Park Ridge, NJ 07656

Account # 104079 Account Type: Cash Term Length: 5 years

Compound Period:

Annual

Nominal Annual Rate:

16.900%

# AMORTIZATION SCHEDULE - Normal Amortization

	Date	Invest	Return	Interest	Net Change	Balance
Invest	4/30/2003	20,028.58			20,028.58	20,028.58
	12/18/2003			2,151.45	17,151.45	37,180.03
	3/21/2007			24,800.52	2,151.45-	35,028.58
2	3/31/2008			6,109.43		41,138.01
Grand Tota		35,028.58	26,951.97	33,061.40	41,138.01	

An open balance of 41,138.01 still remains.

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Page 1

Wilhelm Hall 237 Rock Ave. Park Ridge, NJ 07656

Account #: 204010 Account Type: Cash Term Length: 5 years

Rate Period:

Annual

Nominal Annual Rate:

25.000%

# AMORTIZATION SCHEDULE - U.S. Rule (no compounding)

			interest	Interest	Principal		Balance Due	
Date	Loan	Payment	Accrued	Paid	Paid	Interest	Principal	Total
Loan 2/8/2005	25,000.00		0.00	0.00	0.00	0.00	25,000.00	
1 3/21/2007		13,202.05	13,202.05	13,202.05	0.00	0.00	25,000.00	25,000.00
Loan 3/31/2008	0.00	•	6,421.23	0.00	0.00	6,421.23	25,000.00	31,421.23
Grand Totals	25,000.00	13,202.05	19,623.28	13,202.05	0.00			

An open balance of 31,421.23 still remains.

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Page 1

Wilhelm Hall 237 Rock Ave. Park Ridge, NJ 07656

Account #:

204010 - SOP (IRA)

Account Type: IRA/SOP Term Length: 2 years

Please see the Cash SOP account for Summary of all Warrants

Compound Period:

Annual

Nominal Annual Rate:

18.000%

### AMORTIZATION SCHEDULE - Normal Amortization

Date	Invest	Balance Date	Return	Interest	Net Change	Balance
Invest 6/28/2007	25,979.85				25,979.85	25,979.85
Invest 6/28/2007	50.00			0.00	50.00	26,029.85
Jance Date 3/31/2008		0.00		3,555.75	3,555.75	29,585.60
Grand Totals	26,029.85	0.00	0.00	3,555.75	29,585.60	•

An open balance of 29,585.60 still remains.

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Page 1

Jonathan Patton 4021-C Camellia Drive Valdosta, GA 31605

Account #:

204048

Account Type: Cash

Term Length: 2 years

Rate Period:

Annual

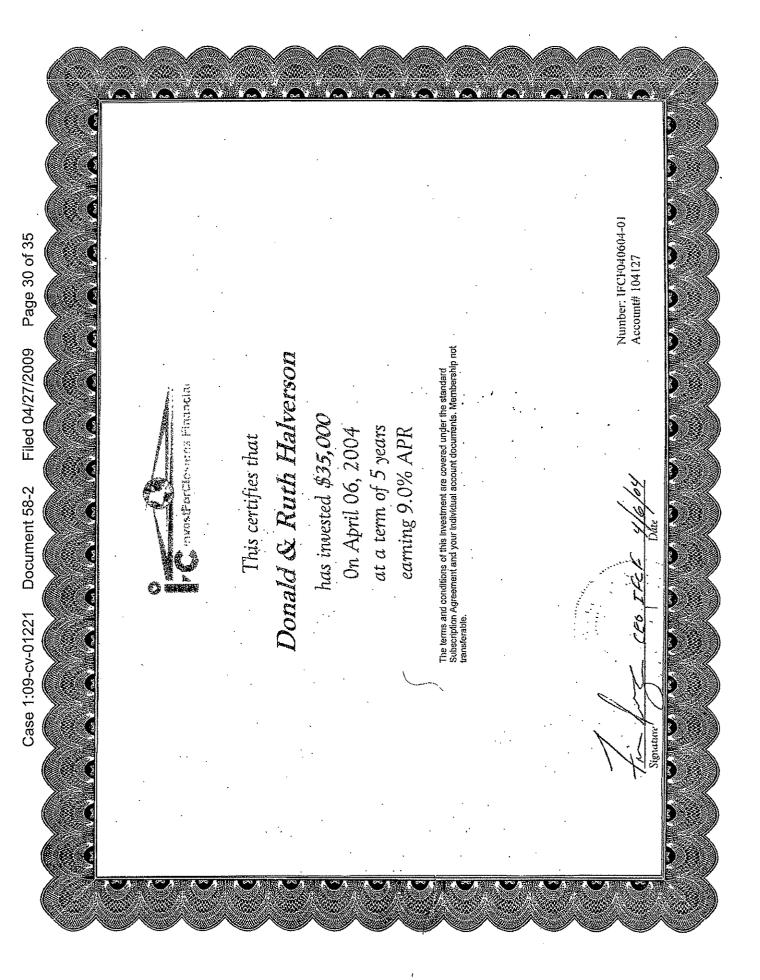
Nominal Annual Rate:

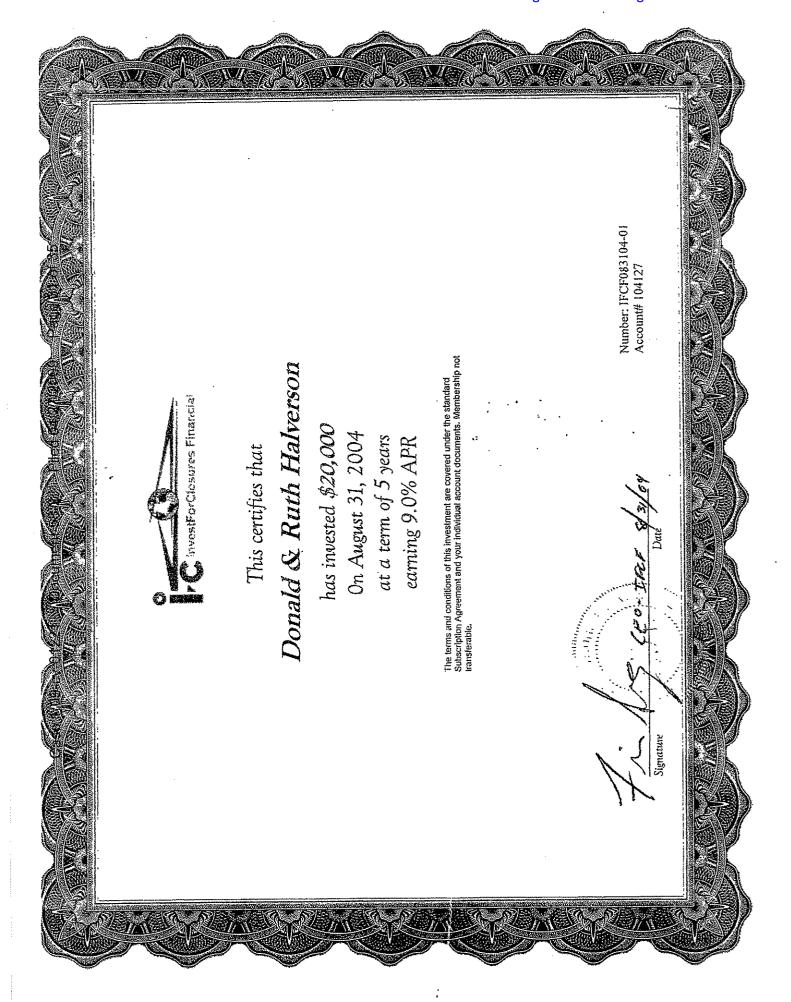
14.000%

# AMORTIZATION SCHEDULE - U.S. Rule (no compounding)

			Interest	Interest	Principal		Balance Due	No. 100 (100 (100 (100 (100 (100 (100 (100
Date	Loan	Payment	Accrued-	Paid	Paid	Interest	Principal	Total
Loan 12/11/2006	40,000.00		0.00	0.00	0.00	0.00	40,000.00	40,000.00
Loan 3/31/2008	0.00		7,287.67	0.00	0.00	7,287.67	40,000.00	47,287.67
Loan 6/30/2008	0.00		1,396.16	0.00	0.00	8,683.83	40,000.00	48,683.83
Loan 9/30/2008	0.00		1,411.51	0.00	0.00	10,095.34	40,000.00	50,095.34
Loan 12/31/2008	0.00		1,411.51	0.00	0.00	11,506.85	40,000.00	51,506.85
Loan 3/31/2009	0.00		1,380.82	0.00	0.00	12,887.67	40,000.00	52,887.67
Grand Totals	40,000.00	0.00	12,887.67	0.00	0.00			

An open balance of 52,887.67 still remains.







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Page 1

The Halverson Family Trust
Donald & Ruth Halverson, Trustees
19 Pier Point
New Bern, NC 28562

Account # 104127 Account Type: Cash Term Length: 5 years

Compound Period:

Annual

Nominal Annual Rate:

9.000%

# AMORTIZATION SCHEDULE - Normal Amortization, 360 Day Year

	Date	Invest	Return	Interest	<b>Net Change</b>	Balance
Invest	4/6/2004	35,000.00			35,000.00	35,000.00
Invest	8/31/2004	20,000.00		1,286.25	21,286.25	56,286.25
1	3/19/2007		15,217.38	13,931.13	1,286.25-	55,000.00
2	3/31/2008		0.00	5,129.85	5,129.85	60,129.85
3	6/30/2008		0.00	1,367.95	1,367.95	61,497.80
4	9/30/2008		0.00	1,414.45	1,414.45	62,912.25
5	12/31/2008		0.00	1,446.98	1,446.98	64,359.23
Grand Totals		55,000.00	15,217.38	24,576.61	64,359.23	

An open balance of 64,359.23 still remains.

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The Halverson Family Trust
Donald & Ruth Halverson, Trustees
19 Pier Point
New Bern, NC 28562

Account #: 204023 Account Type: Cash Term Length: 5 years

Rate Period:

Annual

Nominal Annual Rate:

15.000%

# AMORTIZATION SCHEDULE - U.S. Rule (no compounding)

				Interest	Interest	Principal		Balance Due	
	Date	Loan	Payment	Accrued	Paid	Paid	Interest	Principal	Total
Loan	7/7/2005	20,000.00		0.00	0.00	0.00	0.00	20,000.00	20,000.00
1	3/19/2007		5,095.89	5,095.89	5,095.89	0.00	0.00	20,000.00	20,000.00
Loan	3/31/2008	0.00		3,098.63	0.00	0.00	3,098.63	20,000.00	23,098.63
Loan	6/30/2008	0.00		747.95	0.00	0.00	3,846.58	20,000.00	23,846.58
Loan	9/30/2008	0.00		756.16	0.00	0.00	4,602.74	20,000.00	24,602.74
Loan	12/31/2008	0.00		756.16	0.00	0.00	5,358.90	20,000.00	25,358.90
<b>Grand Tota</b>	ls	20,000.00	5,095.89	10,454.79	5,095.89	0.00			

An open balance of 25,358.90 still remains.

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The Halverson Family Trust
Donald & Ruth Halverson, Trustees
19 Pier Point
New Bern, NC 28562

Account #: 204023 - SOP Account Type: Cash/SOP Term Length: 2 years

Warrants:

40,313 Warrants 1:1 for fresh dollars and interest accumulated 3,047 15% Warrant Bonus on accumulated interest for being in IFC since 2004 43,360 Total Warrants as of 3.19.07

Compound Period:

Annual

Nominal Annual Rate:

18.000%

### AMORTIZATION SCHEDULE - Normal Amortization

			Date	Loan	Payment	Interest	Principal	Balance
	Fryl		3/19/2007	20,000.00				20,000.00
Ach	204027	Loan	3/19/2007	5,095.89	Enterest	0.00	0.00	25,095.89
ACT	Jaul 27	Loan	3/19/2007	15,217.38	Enteres	0.00	0.00	40,313.27
	11. 37. ~7	Loan	3/31/2008	0.00		7,537.90	7,537.90-	47,851.17
•		1	6/30/2008		0.00	2,147.40	2,147.40-	49,998.57
		2	9/30/2008		0.00	2,268.43	2,268.43-	52,267.00
		3	12/31/2008		0.00	2,371.35	2,371.35-	54,638.35
Grand Totals			40,313.27	0.00	14,325.08	14,325.08-		

An open balance of 54,638.35 still remains.